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Attorneys for Defendant

META PLATFORMS, INC.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

JOHN STOSSEL, an individual,

Plaintiff,

v.

FACEBOOK, INC., a Delaware corporation;
SCIENCE FEEDBACK, a French non-profit
organization; and CLIMATE FEEDBACK, a
French non-profit organization,

Defendants.

Case Number: 5:21-cv-07385-VKD

**DECLARATION OF MOLLY M.
JENNINGS IN SUPPORT OF
DEFENDANT META PLATFORMS,
INC.'S MOTION TO DISMISS AND
SPECIAL MOTION TO STRIKE
COMPLAINT UNDER CALIFORNIA'S
ANTI-SLAPP STATUTE**

I, Molly M. Jennings, declare as follows:

1. I am an attorney at Wilmer Cutler Pickering Hale and Dorr LLP, counsel for Defendant Meta Platforms, Inc. in the above-captioned action.¹ I am a member in good standing of the Washington, D.C. Bar, and I am admitted *pro hac vice* to appear before this Court. I submit this declaration in support of Defendant's Motion to Dismiss and Special Motion to Strike Complaint under California's Anti-SLAPP Statute.

2. Attached hereto as **Exhibit 1** is a true and correct copy of a letter sent by my colleague Sonal N. Mehta, counsel for Defendant, to Krista L. Baughman, Plaintiff's counsel, on November 15, 2021.

3. Attached hereto as **Exhibit 2** is a true and correct copy of Meta Business Help Center's "About Fact-Checking on Facebook" webpage, available at <https://www.facebook.com/business/help/2593586717571940?id=673052479947730>.

4. Attached hereto as **Exhibit 3** is a true and correct copy of Science Feedback's homepage, available at <https://sciencefeedback.co/>.

5. Attached hereto as **Exhibit 4** is a true and correct copy of Meta Business Help Center's "Rating Options for Fact-Checkers" webpage, available at <https://www.facebook.com/business/help/341102040382165?id=673052479947730>.

6. Attached hereto as **Exhibit 5** is a true and correct copy of a transcript prepared by a certified court reporter of John Stossel's video titled "Government Fueled Fires," which is available at <https://www.facebook.com/JohnStossel/videos/743082746536680/>.

7. Attached hereto as **Exhibit 6** is a true and correct copy of Climate Feedback's "Climate change, forest management and several other causes contribute to wildfire severity and

¹ On October 28, 2021,

1 total area burned in the western United States” webpage, available at
2 [https://climatefeedback.org/claimreview/climate-change-forest-management-and-several-other-](https://climatefeedback.org/claimreview/climate-change-forest-management-and-several-other-causes-contribute-to-wildfire-severity-and-total-area-burned-in-the-western-united-states/)
3 [causes-contribute-to-wildfire-severity-and-total-area-burned-in-the-western-united-states/](https://climatefeedback.org/claimreview/climate-change-forest-management-and-several-other-causes-contribute-to-wildfire-severity-and-total-area-burned-in-the-western-united-states/).

4 8. Attached hereto as **Exhibit 7** is a true and correct copy of a transcript prepared by
5 a certified court reporter of John Stossel’s video titled “Are We Doomed?,” which is available at
6 <https://www.facebook.com/100044336443834/videos/844893982901945>.

7 9. Attached hereto as **Exhibit 8** is a true and correct copy of Climate Feedback’s
8 “Video promoted by John Stossel for Earth Day relies on incorrect and misleading claims about
9 climate change” webpage, available at [https://climatefeedback.org/evaluation/video-promoted-](https://climatefeedback.org/evaluation/video-promoted-by-john-stossel-for-earth-day-relies-on-incorrect-and-misleading-claims-about-climate-change/)
10 [by-john-stossel-for-earth-day-relies-on-incorrect-and-misleading-claims-about-climate-change/](https://climatefeedback.org/evaluation/video-promoted-by-john-stossel-for-earth-day-relies-on-incorrect-and-misleading-claims-about-climate-change/).

11 I declare under penalty of perjury under the laws of the United States of America that the
12 foregoing is true and correct.

13 Executed on this 29th day of November 2021 in Washington, D.C.

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17 By: /s Molly M. Jennings
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SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing. Pursuant to Civil Local Rule 5-1(h), I hereby attest that the other signatories have concurred in this filing.

Dated: November 29, 2021 November 29,
2021

By: /s Sonal N. Mehta
Sonal N. Mehta